

Remedium

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U.S. Environmental Protection Agency
EPR-SR
1595 Wynkoop Street
Denver, CO 80202

Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – December 2009

Dear Bonnie:

This progress report describes work completed during the month of December 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during December 2009.

A. ACTIONS TAKEN

- Participated in a meeting in Missoula, Montana on December 16 with representatives of EPA, the U.S. Forest Service and the State of Montana to discuss scoping of the Phase IV Remedial Investigation.
- Continued preparation of the Phase III Field Sampling Summary Report (FSSR).
- Continued preparation of initial sections of the OU3 Remedial Investigation Report.

B. SAMPLING RESULTS

None.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Continue preparation of the Phase III Field Sampling Summary Report and continue preparation of the OU3 Remedial Investigation Report.
- Submit the draft Phase III FSSR to EPA by February 5, 2010.

- Review and comment on draft Phase IV Sampling and Analysis Plan(s) as they are issued by EPA.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

Parametrix

The following is a summary of the actions taken and progress made during the month of December.

A. ACTIONS TAKEN

- Conducted literature searches for literature on Peromyscus eye lens weight/age relationships.
- Continued coordination with histologist at Northwest Zoopath.
- Prepared and submitted (to Montana Department of Fish, Wildlife, Parks) data summaries for both aquatic and small mammal programs to support scientific collection permits.
- Continued aquatic data (invertebrate, fish) data analysis.
- Continued small mammal data analysis.
- Continued preparation of 2009 small mammal program data report.
- Continued preparation of 2009 aquatic program data report.
- Coordination with Bill Stubblefield on BTAG Subgroup memo preparation.
- Continued financial reporting, supervision and project management activities.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Conduct Peromyscus eye lens extractions and weighing.
- Prepare and submit BTAG Subgroup recommendations memo (analytical, bioassay recommendations).
- Receive histology report from NorthWest Zoopath.

- Submit 2009 aquatic program data report.
- Submit 2009 small mammal program data report (field plus histology).
- Prepare bioassay protocol addressing fiber/clump analytical and exposure concerns.

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/
ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

The BTAG subgroup identified concerns with the analytical method(s) used for asbestos in surface water with regard to the reporting of clumped versus free fibers and resulting implications of the method(s) to providing an understanding and basis for evaluating aquatic exposure (and potential toxicity) in a planned bioassay. The Subgroup is continuing its work to develop a memo with recommendations that include approaches for addressing analytical method short comings and bioassay test modifications necessary to allow successful exposure evaluation in any proposed aquatic bioassay.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner - Grace
John Garr - MWH
Robert Marriam - Grace
Sue Robinson - Parametrix
Dick Sloan - Montana DEQ